

217/782-2113

CONSTRUCTION PERMIT - NSPS SOURCE

PERMITTEE

Renewable Fuel of Carbondale, LLC
Attn: Phil Danforth
P.O. Box 894
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Application No.: 03080049

I.D. No.: 077015ACF

Applicant's Designation: ETHANOLPLT

Date Received: August 25, 2003

Subject: Ethanol Production

Date Issued:

Location: 2101 North McRoy Drive, Carbondale, Illinois

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a fuel ethanol plant with a nominal design capacity of 137,000 gallons/day as described in Attachment A and other ancillary operations as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a.
 - i. The annual ethanol production of the plant, as shipped including denaturant, shall not exceed 50 million gallons.
 - ii. Annual grain receipts shall not exceed 18,656,000 bushels.
 - iii. Compliance with these annual limits shall be determined from a running total of 12 months of data.
- b.
 - i. Only gaseous fuel shall be fired in the boiler, auxiliary boiler and feed dryer.
 - ii. The maximum fuel firing rate of the boiler shall not exceed 87 mmBtu/hour.
 - iii. The maximum fuel firing rate of the feed dryer shall not exceed 84.5 mmBtu/hour.
 - iv. The maximum fuel firing rate of the auxiliary boiler shall not exceed 81.1 mmBtu/hr.
- 2a. The emissions of the plant shall not exceed the limitations in Attachment B. As a consequence of this condition and other conditions of this permit, this permit is issued based on the plant not constituting a new major source subject to federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- b.
 - i. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the plant shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition and other conditions of this permit, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
 - ii. If not otherwise specified for a particular emission unit, the emissions of HAPs, other than acetaldehyde, shall not exceed the following limits, which are expressed as a percentage of the VOM limitations: (See Attachment B)

Individual HAP: 10.0 percent of VOM limit.
Aggregate HAPs: 15.0 percent of VOM limit.
 - iii. The limitations for HAP emissions may be revised by the Illinois EPA based on the results of emission testing, if requested by the Permittee, provided that such revised limitations would continue to assure compliance with applicable rules.
- 3a. The boilers are subject to a New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. There are no applicable NSPS requirements for particulate matter or sulfur dioxide pursuant to 40 CFR 60, Subpart Dc as the boilers are only firing natural gas.
- 4a.
 - i. Components in volatile organic compound service in the Fermentation and Distillation process units are subject to the NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry (SOCMI), 40 CFR 60, Subparts VV, and related provisions in 40 CFR 60, Subpart A.
 - ii. The Permittee shall implement a leak detection and repair program, including associated recordkeeping and reporting in accordance with applicable provisions of 40 CFR 60.480 through 60.488. Note: If the plant has more than 1500 components in gas or light liquid service, the leak detection and repair program must also satisfy applicable requirements of 35 IAC Part 215, Subpart Q, Leaks.
- b.
 - i. This permit is issued based on the fermentation operations not being subject to the NSPS for VOC emissions from SOCMI Reactor Processes, 40 CFR 60 Subpart RRR, because the fermentation tanks involve a biological reaction and operate as batch processes.

- ii. This permit is issued based on the distillation operations not being subject to the NSPS for VOC emissions from SOCM Distillation Operations, 40 CFR 60 Subpart NNN, based upon guidance from USEPA that this regulation does not apply to processing of material produced by biological reaction. (If this NSPS were applicable, it would require achievement of 98 percent control for VOM emissions.)
- 5a. The storage tanks (Tanks T2101-T2104) are subject to NSPS for Volatile Organic Liquid Storage Vessels, 40 CFR, Subparts A and Kb.
- b. The storage tanks (Tanks T2101-T2104) shall be equipped with an internal floating roof with one of the following closure devices pursuant to the NSPS, 40 CFR 60.112b(a) (1) (i):
- i. A foam-filled or liquid-filled liquid mounted seal;
 - ii. Two continuous seals; or
 - iii. A mechanical shoe.
- c. Storage tanks (Tanks T2101-T2104) shall be operated in compliance with the applicable operating requirements of the NSPS, 40 CFR 60.112b(a) (1) and 60.113b(a), as summarized in Attachment C.
- d. The Permittee shall maintain all applicable monitoring of operation data requirements of the NSPS, 40 CFR 60.116(b) for all tanks.
6. At all times, the Permittee shall maintain and operate emission units that are subject to the NSPS, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11(d).
- 7a. Except for the grain handling operations, which are subject to 35 IAC Part 212, Subpart S, the emission of particulate matter into the atmosphere in any one hour period from each process emission unit at the plant, either alone or in combination with the emission of particulate matter from all other similar process emission units shall not exceeds the allowable emission rates specified in 35 IAC 212.321(c).
- b.
- i. The emission of smoke or other particulate matter from each emission unit shall not exceed opacity of greater than 30 percent [35 IAC 212.123(a)].
 - ii. Notwithstanding the above that an opacity of greater than 30 percent but less than 60 percent shall be allowed for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit at the plant, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour

period, pursuant to 35 IAC 212.123(b). If the Permittee elects to rely on this provision, appropriate determinations of opacity shall be made on a minute-by-minute basis and records maintained to demonstrate that the various elements of this provision have been satisfied.

- 8a. The grain handling operation shall be operated in compliance with operating requirements of 35 IAC 212, Subpart S, as summarized in Attachment D.
- b. This permit is issued based on the grain handling and storage operations at the plant are not being subject to New Source Performance Standard for Grain Elevator, 40 CFR 60, Subpart DD because the permanent storage capacity of the plant does not meet the threshold for applicability of these standards.
- 9a. The loading/unloading rack shall be operated in compliance with the provisions in Attachment E and the Permittee shall route vapor displaced by ethanol load out to a flare or equivalent combustion-type control device. This flare shall be designed and be operated to comply with applicable requirements of 40 CFR 60.18, as summarized in Attachment F.
- b. This permit is issued based on the loadout of ethanol not being subject to applicable requirements for handling of gasoline because the vapor pressure of the product ethanol is less than 4.0 psi.
- 10. The Permittee shall operate and maintain the emission units at this plant, including associated air pollution control equipment, in a manner consistent with good air pollution control practice, as follows:
 - a. At all times, including periods of startup, shutdown, malfunction or breakdown, operate as practicable to minimize emissions.
 - b. Conduct routine inspection and perform appropriate maintenance and repairs to facilitate proper functioning of equipment and minimize or prevent malfunctions and breakdowns.
 - c. Install, calibrating and maintaining required instrumentation according to the supplier's specifications or as otherwise necessary to assure reliable operation of such devices.
- 11. a. The key operating parameter of the pre-fermentation, fermentation and distillation scrubbers for the affected processes shall be maintained at levels that are consistent with levels at which emission testing demonstrated compliance with applicable requirements, including the following:
 - i. Scrubber water flow rate: gal/min, hourly average
 - ii. Scrubber water outlet temperature: °F, hourly average
 - iii. Scrubber exhaust gas outlet temperature: °F, hourly average

- b. If the differential pressure across a scrubber is outside of the normal operating range for a period of 4 hours, the Permittee shall inspect the scrubber within 24 hours and initiate appropriate corrective action to restore the pressure drop of the scrubber to the normal range.
 - c. The Permittee shall operate and maintain the scrubbers in accordance with written procedures developed and maintained by the Permittee.
 - d.
 - i. If emission testing of an affected process shows compliance with requirements for VOM by less than a 20 percent (e.g., for the pre-fermentation scrubber, a tested control efficiency of less than 98.36%, compared to the limit of 97.95%) the Permittee shall implement a Control Improvement Program (Program) for the affected process with the objective of achieving compliance by a margin of at least 20 percent.
 - ii. The Permittee shall submit a copy of the program to the Illinois EPA for its review and comments within 30 days after receiving test results that triggers this requirement for a Control Improvement Program (Program).
 - iii.
 - A. If the emission testing demonstrated that the compliance margin was between 10 and 20 percent, the Program shall be completed in one year.
 - B. If the emission testing demonstrated the compliance margin was less than 10 percent, the Program shall be completed in six months.
 - C. Following completion of the Program, the Permittee shall again test VOM emissions from the affected process.
- 12a. The boiler shall be operated whenever the feed dryer is in operation, as the boiler serves as the control device for VOM and CO emissions from this unit.
- b.
 - i. The VOM emissions from feed dryer shall be controlled by at least 98.5 weight percent (comparing the VOM entering and exiting the boiler) or to a concentration of no more than 20 ppmv as measured at the exit of the boiler, whichever is less stringent.
 - ii. The CO emissions generated by the fermentation units shall be controlled by at least 90 weight percent or to a concentration of no more than 100 ppmv, whichever is less stringent, determined in the same manner as above.

- iii. The boiler shall be designed and maintained to comply with these standards whenever the feed dryer is in operation, independent of the level of steam being produced by the boiler.
 - c. The combustion chamber of the boiler shall be heated to the manufacturer's recommended temperature or the temperature at which compliance was demonstrated in most recent compliance test, prior to beginning operation of the feed dryer that it controls.
 - d. Written procedures for the operation, maintenance, and monitoring of the boiler shall be kept in the boiler control room.
 - e. There shall be no bypasses in the duct work connecting the feed dryer to the boiler.
 - f. If the emission testing of the boiler shows compliance with VOM limitations by less than a 20 percent margin, the Permittee shall implement a Control Improvement Program for the boiler as set by Condition 11(d).
- 13a. Fabric filters (baghouses) on process emission units shall comply with a PM emission limit of 0.005 grain per standard foot and be operated and maintained in accordance with good air pollution practice to minimize emissions.
- b. i. Particulate matter (PM) emissions and operation of process emission units shall not exceed the following limits:

<u>Equipment</u>	<u>PM Emissions</u>	
	<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
Grain Receiving and Handling	1.01	8.78
Hammermilling Operation	0.43	1.88
Dry Feed Loadout	----	0.75
Cooling Tower	----	4.16

Note: Air flow limits may be increased by the Illinois EPA if the PM emission limits of Condition 13(a)(i) are reduced so that annual emission limits do not increase.

These limits are based on information in the application, including the manufacturer's guarantees for control devices (0.005 gr/scf for grain unloading and handling, hammermilling operation, and dry feed loadout).

- ii. The above limits do not account for uncaptured emissions from the receiving of grain and loadout of feed, which are assumed to be equal to the captured or filterable emissions as addressed above.
- iii. The feed cooler discharge shall be routed through a baghouse to remove particulate matter used as combustion air to the dryer burner or vented with the dryer exhaust to the boiler. There shall be no direct discharge from the cooler or baghouse to the atmosphere.

- 14a. i. A. The VOM emissions from the principal fermentation units, i.e., the pre-fermentation tanks, fermenter tanks and beer well, shall be controlled by devices that achieve at least 98.3 percent efficiency, by weight or to a concentration of no more than 20 ppmv, whichever is less stringent.
- B. The operating parameter(s) of the air pollution control equipment for the principal fermentation units shall be maintained at levels that are consistent with levels at which emission testing demonstrated compliance with applicable requirements.
- C. The plant shall be designed to allow the routine inspection and maintenance of the fermentation scrubber to be performed without discharging uncontrolled fermentation emissions to the atmosphere.
- ii. VOM emissions of the principle fermentation units shall not exceed the following limits:

	VOM Emissions	
	(Lbs/Hr)	(T/Yr)
Pre-fermentation Tanks (Scrubber 1400)	3.79	16.61
Fermentation Tanks and Beer Well (Scrubber 1401)	8.49	37.18

These limits are based on information in the application for maximum emissions including a representative VOM factor for fermentation (uncontrolled VOM emission rate 185 lbs/hour for pre-fermentation scrubber and 602 lbs/hr for main scrubber), nominal scrubber efficiency (97.95% for pre-fermentation scrubber and 98.59% for fermentation scrubber), and continuous operation.

- b. i. A. The VOM emissions from the principle distillation units, i.e., the 200 proof condenser, shall be controlled by at least 99.04 weight percent or to a concentration of no more than 20 ppmv, whichever is less stringent.
- B. The operating parameter(s) of the air pollution control equipment for the principle distillation units shall be maintained at levels that are consistent with levels at which emission testing demonstrated compliance with applicable requirements.
- ii. VOM emissions of the principle distillation units shall not exceed the following limits:

VOM Emissions	
<u>(Lbs/Hour)</u>	<u>(Tons/Year)</u>
1.05	4.59

These limits are based on information in the application for maximum emissions including a representative VOM factor for distillation (uncontrolled VOM emission rate 109.1 lb/hour), nominal scrubber efficiency (99.04%), and continuous operation.

- c. VOM emissions for heat recovery evaporator shall not exceed 0.44 tons/year. This limit is based on information in the application for estimates of wet cake production rate and determined on an annual basis.
- d. VOM and CO emissions of feed dryer and boiler shall not exceed the following limits. Compliance with these limits shall be determined at the exhaust of the boiler, as it is used as the control device for feed dryer, based on emission testing and monitoring as required elsewhere by this permit, and from operation of the boiler and the feed dryer.

<u>Pollutant</u>	<u>(Lbs/Hour)</u>	<u>(Tons/Year)</u>
VOM	1.60	6.99
CO	4.78	20.94

These limits are based on information in the application for maximum VOM emissions from the feed dryer and fuel combustion, and boiler VOM and CO destruction efficiency of 98.5% and 96.2%, respectively for process emissions.

- e. VOM emissions for wet cake storage/loading shall not exceed 0.36 tons/year. This limit is based on information in the application for wet cake production on an annual basis and associated VOM emission factor.
- f.
 - i. The VOM emissions from the principal storage tanks (T2101-T2104) shall be operated to meet the control requirements of the NSPS.
 - ii. VOM emissions from the storage tanks (off spec storage tank, anhydrous alcohol storage tank, denatured alcohol storage tank, and gasoline storage tank) combined shall not exceed 1.92 tons/year. This limitation is based on the maximum emissions of the storage tanks given the required control measures for the tanks.
- g. VOM emissions of ethanol loading racks shall not exceed the following limits:

<u>VOM Loss Rate</u> <u>(Lbs/1,000 Gal)</u>	<u>VOM Emissions</u> <u>(Tons/Year)</u>
0.494	12.79

These limits are based on the throughput rate (52,632,000 gallons/year), overall control efficiency (88.0%), and loading loss calculated based on standard USEPA emission factors from AP-42.

- h. VOM emission from equipment leaks shall not exceed 15.14 tons/year. This limit is based on emission estimates of all the valves, pump seal, compressor seal, pressure relief valves, sampling connections, open ended lines and flanges. Compliance with this limit shall be determined on an annual basis.
 - i. VOM emissions from miscellaneous VOM emission units, e.g., mash screen vent, boiler feed water tank, syrup tank, and thin stillage tank, shall not exceed 1.0 ton/yr, total. This limit is based on estimates of maximum VOM emissions made in the application. Compliance with this limit shall be determined on an annual basis.
15. Emissions and operation of the boiler (including both process and fuel combustion emissions) shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Lb/Hour)</u>	<u>(Tons/Year)</u>
NO _x	8.62	37.76
CO	See Condition 14(d)	
SO ₂	0.12	0.54
PM	1.29	5.62
VOM	See Condition 14(d)	

These limits are based on information in the application including maximum firing rate (87 mmBtu/hour for boiler and 84.5 mmBtu/hour for dryer exhausted to the boiler), emission factors, nominal 90% boiler control efficiency for process PM emissions, and continuous operation.

16. Emissions and operation of the auxiliary boiler shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Lb/Hour)</u>	<u>(Tons/Year)</u>
NO _x	2.84	11.92
CO	6.80	29.80
SO ₂	0.01	0.04
PM	0.09	0.34
VOM	0.37	1.64

These limits are based on information in the application including maximum firing rate (81.1 mmBtu/hour), standard emission factors, and continuous operation.

17. This permit is issued based on negligible emissions of NO_x and CO from the loadout flare. For this purpose emissions of each contaminant shall not exceed the nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

18. Fugitive dust (PM emissions) from vehicle traffic shall not exceed 74.68 tons/year. Compliance with this limit shall be based on standard emission factors published by USEPA.
19. Compliance with annual limits established by this permit shall be determined from a running total of 12 months of data, unless another approach is specified in the applicable limitation or associated recordkeeping provisions. For this purpose, for emission units for which emissions are determined by engineering calculations, such as storage tanks, leaking components and fugitive dust, the Permittee shall perform calculations of emissions on at least an annual basis.
20. The Permittee shall fulfill applicable notification and recordkeeping requirements of the NSPS, 40 CFR 60.7 for the construction and operation of the emission units subject to the NSPS. Notification shall be made in writing to the Illinois EPA and shall include the following:
 - a. Written notification of commencement of construction, no later than 30 days after such date [40 CFR 60.7(a)(1)];
 - b. Written notification of the actual date of initial startup, within 15 days after such date [40 CFR 60.7(a)(3)].
- 21a. i. Within 180 days of initial startup of emission units, emissions of selected units as specified in the following table, shall be measured during conditions which are representative of maximum emissions:

Emission Unit/Process	EMISSIONS						Efficiency***	
	PM	VOM	NO _x	CO	HAP	Opacity	VOM	CO
Boiler*	X**	X*	X	X*	X		X*	X*
Grain Receiving	X					X		
Pre Fermentation (Scrubber)		X			X		X**	
Main Fermentation (Scrubber)		X			X		X**	
Distillation (Scrubber)		X			X		X**	
Dry Feed Loadout	X					X		

* If the boiler is not designed to provide 0.75 seconds residence time in the combustion zone at the maximum firing rate of the boiler, emission testing shall be conducted under two operating scenarios to evaluate compliance with the minimum combustion chamber temperature and minimum residence time at which the Permittee intends to normally operate the boiler.

** Particulate matter tests shall include measurements of condensable particulate matter, as collected in the back half of the Method 5 sampling train or by separate measurements using USEPA Method 202 (40 CFR Part 51, Appendix M).

*** Efficiency testing need not be performed if the Permittee is demonstrating compliance based on the concentration of VOM or CO in the exhaust, provided however that test ports for testing of the inlet emissions shall still be present.

ii. In addition to the emission testing required above, the Permittee shall perform emission tests as requested by the Illinois EPA for an emission unit within 45 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA.

b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the USEPA or Illinois EPA: Refer to 40 CFR 60, Appendix A, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3 or 3A
Moisture	USEPA Method 4
Particulate Matter	USEPA Method 5
Volatile Organic Material	USEPA Method 18 and 25A*
Carbon Monoxide	USEPA Method 10
Nitrogen Oxides	USEPA Method 19**, 7 or 7E
Hazardous Air Pollutants	USEPA Method 18*
Opacity	USEPA Method 9

* Testing shall also be conducted in accordance with industry-specific guidance from USEPA on testing VOM emissions at ethanol plants, which requires testing for specific HAPs including acetaldehyde.

** Emission testing shall be conducted in conjunction with certification of the emission monitors required by Condition 18(a).

c. The following measurements shall also be made during emission testing based on representative sampling and analysis:

i. Amount of water in wet cake as entering the feed dryer and in dry feed as leaving the dryer, lb water/lb material.

ii. Calculated amount of water removed in the feed dryer, lb/hour.

d. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Compliance Section of the Division of Air Pollution Control for review. This plan shall describe the specific procedures for testing, including as a minimum:

i. The person(s) who will be performing sampling and analysis and their experience with similar tests.

ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

- iii. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - iv. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - vi. The format and content of the Source Test Report.
- e. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- f. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 14 days after the test results are compiled and finalized but no later than thirty (30) days after completion of sampling. The Final Report shall include as a minimum:
- i. A summary of results
 - ii. General information
 - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule
 - iv. Detailed description of test conditions, including
 - A. Plant operating rates, i.e., ethanol and feed production rate,
 - B. Unit operating information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption, throughput, or steam load and
 - C. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration

- g. Copies of emission test reports shall be retained for at least five years after the date that an emission test is superseded by a more recent test.
- 22a.
 - i. The Permittee shall install, calibrate, maintain and operate a CO continuous emission monitoring system on the exhaust from boiler within one year after the initial emission testing required by Condition 21 unless this testing or further testing conducted by the Permittee demonstrates that the unit normally complies with the compliance in Condition 14 by a margin of at least 25 percent or the Illinois EPA approves further time for the Permittee to achieve this performance.
 - ii.
 - A. This monitoring system shall be operated during all periods of operation of the combustion unit except for continuous emission monitoring system breakdowns and repairs.
 - B. The Permittee shall maintain records for the continuous monitoring systems, including recorded emission concentrations and records of maintenance, calibration, and operational activity associated with the system.
 - C. The Permittee shall submit quarterly monitoring reports to the Illinois EPA for these systems.
 - iii. The requirements for CO monitoring systems may be revised or waived in the operating permit for the source if the Illinois EPA determines that compliance with requirements for CO emissions is not facilitated to a significant degree by such monitoring.
- b.
 - i. The Permittee shall equip the boiler with a continuous monitoring device for boiler combustion chamber temperature.
 - ii. The Permittee shall either equip the boiler with device(s) to indicate flow of principle process vent stream(s) to the boiler or equip the emergency releases for such streams, if any, with device(s) to indicate flow through the emergency release, which device(s) shall record such information at least once every hour.
 - iii. These devices shall be installed, calibrated, and maintained according to the supplier's specifications and shall be operated at all times that the boiler is in use.
- 23. The Permittee shall keep the following records for raw material and fuel usage, material throughputs, and production:
 - a. Grain receipts (tons/month and tons/year).
 - b. Ethanol production, as measured at the loading racks (gallons/month and gallons/year).

- c. Natural gas usage for each category of equipment (feed dryer, boiler, and auxiliary boiler) (scf/month and scf/year).
 - d. Feed production as shipped, (dry feed: tons/month and tons/year, and wet feed: tons/month and tons/year).
 - e. Material throughput for each storage tank (gallons/month and gallons/year).
- 24a. The Permittee shall keep a file that contains the maximum PM emission rate of each process emission unit with supporting assumptions and documentation.
- b.
 - i. The Permittee shall keep an operating log and a log for inspections, maintenance, and repairs for each baghouse, including the time when the baghouse is not in service.
 - ii. The Permittee shall keep all other data used or relied upon to determine the particulate matter (PM) emissions of process emission units including grain handling operations.
 - c. The Permittee shall keep records of PM emissions from process emission units (tons/month and tons/year) based on appropriate emission factors and operating data, with supporting calculations. These records shall be compiled on at least a quarterly basis.
- 25a.
 - i.
 - A. The Permittee shall equip the pre-fermentation scrubber, main fermentation scrubber, and distillation scrubber with a continuous monitoring devices for the temperatures of the exhaust gas exiting the scrubber and the scrubbant collected at the bottom of the scrubber. This device shall be installed, calibrated and maintained according to the supplier's specifications and record data average data for 3-hour periods of scrubber operating.
 - B. The Permittee shall equip the pre-fermentation scrubber, main fermentation scrubber, and distillation scrubber with instrumentation or other devices to measure other key operating parameters of the pre-fermentation scrubber, main fermentation scrubber, and distillation scrubber, such as, temperature of scrubbant, scrubbant flow rate, scrubbant recirculation rate, gas exhaust temperature, and pressure drop. If measurements are not recorded by the computerized data logging system for the fermentation and distillation department, measurements shall be manually recorded at least once per shift.
 - C. The Permittee shall equip the pre-fermentation scrubber, main fermentation scrubber, and distillation scrubber with features that enable it to readily identify an increase in the gas flow rate to the scrubber, such as a device to measure gas flow rate, or otherwise conduct periodic measurements to identify an increase in the gas flow rate to the scrubber. For this purpose, measurements, such

measurements may be direct measurements of gas flow or indirect measurements of parameters, such as oxygen content, that would indicate an increase in the gas flow rate of the scrubber. Measurements shall be made on at least a quarterly basis and after any significant maintenance or repair or other activity that could increase the gas flow rate to the scrubber.

- ii. The Permittee shall keep an operation log and a log for inspection, maintenance, and repairs for fermentation and distillation process units and associated scrubbers including the time when the scrubber is not in operation.
 - iii. The Permittee shall keep records of the VOM and HAP emissions from fermentation and distillation process (tons/month and tons/year), as determined at the scrubbers and any other vents, based on appropriate emission factors, with supporting documentation and calculations.
 - c. i. The Permittee shall keep records for the leak detection and repair program for the fermentation and distillation process units as required by applicable rules.
 - ii. The Permittee shall keep records on at least an annual basis for the VOM and HAP emissions attributable to leaking components, with supporting documentation and calculations. These records shall be compiled on at least a quarterly basis.
 - d. The Permittee shall keep the records for upsets in fermentation or distillation operations or other operations that could generate additional VOM emissions, with a description of the incident, an estimate of the additional VOM and HAP emissions that occurred with supporting calculations, and background information.
26. The Permittee shall maintain records of the following items for each boiler (boiler and auxiliary boiler):
- a. A file of manufacturer's or supplier's specifications for:
 - i. Boiler maximum fuel firing rate.
 - ii. Continuous monitoring devices.
 - b. Natural gas usage for each boiler (ft³/day);
 - c. Operating hours of boiler (hours/month and hours/year).
 - d. The Permittee shall keep inspection, maintenance, and repair logs with date and nature of such activities for the boiler.
 - e. The Permittee shall keep all other data, not addressed above, used or relied upon by the Permittee to determine emissions, including hourly emission data for the boiler as determined by continuous emission monitoring.

- f. The Permittee shall keep records of NO_x, CO, PM, SO₂, VOM, and HAP emissions from each boiler (tons/month and tons/year), based on operating data for the boiler and the processes controlled by the boiler or appropriate emission factors, with supporting calculations. These records shall be compiled on at least a quarterly basis.
- 27a. i. The Permittee shall maintain a file that contains the manufacturer's specifications for maximum fuel firing rate to the feed dryer.
- ii. The Permittee shall keep records for the operating hours for the feed dryer (hours/month and hours/year).
- 28a. The Permittee shall fulfill the applicable recordkeeping requirements of 40 CFR 60.115b for storage tanks pursuant to 40 CFR 60.115b(a), as follows:
 - i. Keep a record of each Annual and Out-of-Service Inspection performed.
 - A. The date the inspection was performed;
 - B. Who performed the inspection;
 - C. The method of inspection;
 - D. The observed conditions of each feature of the internal floating roof (seals, roof decks, and fittings), with the raw data recorded during the inspection; and
 - E. Summary of compliance.
 - ii. The Permittee shall maintain record of the following for each tanks to demonstrate compliance with the Out-of-Service Inspection requirements:

Records that are sufficient to identify whenever the tank is empty for any reason or whenever repairs are made as a result of regular inspection or incident of roof damage or defect.
 - iii. The Permittee shall keep the operating records required by 40 CFR 60.116b for each tank, as follows:

Records of the liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.
- b. The Permittee shall keep records of VOM and HAP emissions from storage tanks (tons/year), as determined using published USEPA emission estimation methodology, such as the TANKS Program with supporting calculation.

- 29a. The Permittee shall maintain records of the following for loading racks:
- i. The identification and properties of each product distributed through the loading rack, as related to emissions, i.e., storage temperature, vapor pressure and molecular weight;
 - ii. The amount of each product distributed through the loading rack, gallons/month and gallons/year; and
 - iii. Confirmation that the flare functioned properly, i.e., a flame was present and no visible emissions were observed except as allowed by 40 CFR 60.18(f)(1).
- b. The Permittee shall maintain records of the following for the loading racks and associated flare:
- i. The presence of a pilot flare.
 - ii. The use of an affected loading rack for loading when there was no pilot flame present in the associated flare, including:
 - A. The date and time of the loading;
 - B. The specific problem with the flare, or flame monitor;
 - C. Amount of material loaded;
 - D. The reason that loading occurred even though the flare did not have a pilot flame;
 - E. Corrective action taken; and
 - F. Action taken to prevent or reduce the likelihood of future occurrences.
 - iii. Implementation of the alternative flare scenarios:
 - A. Identification of the scenario implemented;
 - B. The reason why the main flare was shutdown; and
 - C. The date and time that the alternative operating scenario was implemented.
- c. The Permittee shall keep records for each leak inspection for the loadout system that shall include, as a minimum, the following information:
- i. Date of inspection;

- ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
 - iii. Leak determination method;
 - iv. Corrective action, including the date each leak was repaired and the reasons for any repair interval in excess of 5 days; and
 - v. Name and signature of the person that performed the inspection.
 - d. The Permittee shall maintain records of the total annual emissions of PM, NO_x, CO, VOM and HAP from each loading rack (tons/month and tons/year, with supporting calculations. Emissions data shall be compiled on at least a quarterly basis utilizing a published USEPA methodology, assuming 98 percent destruction if the flare is operated in accordance with Attachment F.
- 30a. The Permittee shall maintain records of the following items related to fugitives particulate matter emissions:
- i. A map or diagram showing the location of significant emission units controlled, including the location, identification, length, and width of roadways;
 - ii. A log recording implementation of control measures for fugitive particulate matter emissions and incidents when the established control measures were not used and a statement of explanation.
- b. The Permittee shall maintain records of the operation and particulate matter emissions of the cooling tower (tons/year), with supporting calculations.
31. All records, logs, or written procedures required by this permit shall be retained at readily accessible location at the source for at least three years from the date of entry and shall be available for inspection by the Illinois EPA upon request. Any records retained in electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 32a. Reports of deviations shall include the following information:
- i. Identify the deviation, with date, time, duration and description.
 - ii. Describe the effect of the deviation on compliance, with an estimate of the excess emissions that accompanied the deviation, if any.
 - iii. Describe the probable cause of such deviations and any corrective actions or preventive measures taken.

- b. Quarterly compliance report shall be submitted no later than 45 days after the preceding calendar quarter. This report shall also provide a listing of all deviations for which immediate or 30-day reporting was required, but need not include copies of the previously submitted information.
 - c. If there are no deviations during the calendar quarter, the Permittee shall still submit a compliance report, which report shall state that no deviations occurred during the reporting period.
- 33a. The Permittee shall submit Quarterly Compliance Reports as specified in the specific conditions of this permit and Condition 32(b).
- b. i. The Permittee shall submit an Annual Emission Report in accordance with 35 IAC Part 254.
 - ii. With its Annual Emission Report the Permittee shall report:
 - A. The annual operating hours of the distillation/fermentation processes and the feed dryer and the percentage of these operating hours, if any, that these units operated out of compliance.
 - B. Significant deficiencies in the condition of emission units and control systems as related to emissions identified during the detailed annual inspection of equipment.
34. The Permittee shall submit written notifications and reports to the Illinois EPA with respect to startup and shakedown of the plant for the following:
- a. The Permittee shall provide the Illinois EPA 30 days advance notification prior to start-up of the plant to allow inspection, and shall include a description of provisions for handling and timely disposition of feed that cannot be dried.
 - b. The Permittee shall provide to the Illinois EPA immediate notification of any event(s) that disrupts orderly shakedown of the plant.
 - c. The Permittee shall provide to the Illinois EPA progress reports, including, but not limited to, the following:
 - i. Overall operating level (gallons/produced), feed production, and percent feed dried;
 - ii. Activities accomplished/significant events;
 - iii. Current schedule for emission testing;

- iv. A summary of any emission measurements conducted at the plant; and
 - v. Outreach activities planned/provided for local communities or interested parties.
 - d. The Permittee shall provide the Illinois EPA notice as to when shakedown of the boiler is considered complete.
- 35a. For the boiler, the Permittee shall submit excess emission reports to the Illinois EPA for any calendar quarter during which there are excess emissions from the boiler. If there are no excess emissions during the calendar quarter, the Permittee shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period.
- b.
 - i. For VOM and CO emissions from the boiler, excess emissions are defined as any 3-hour block average in which the average combustion chamber temperature, when process units controlled by the boiler are operating, was more than 25°F below the temperature during testing than demonstrated compliance with applicable requirements. These requirements may be reviewed and revised by the Illinois EPA during processing of future permitting for the plant.
 - ii. Notwithstanding the above, if continuous emissions monitoring is conducted for CO, the Illinois EPA may establish alternative provisions for exceedances based on monitored data for CO.
36. The Permittee shall submit written notifications and reports to the Illinois EPA as required by the NSPS, for each storage tanks as follows:
- a. A report identifying any deficiencies or shortcomings identified in the Annual Inspection within 30 days of inspection. This report shall include the information specified in 40 CFR 60.115b(a) (3).
 - b. Notification at least 30 days prior to refilling an affected tank for which an Out-of-Service inspection is to afford the Illinois EPA with the opportunity to have an observer present.
 - c. If the inspection is not planned and the Permittee could not have known about refilling the tank 30 days in advance, a shorter notification may be accepted as provided for in 40 CFR 60.113b(a) (5).
 - d. A report identifying any deficiencies or shortcomings identified in the Out-of-Service Inspection within 30 days of the inspection. This report shall include the information specified in 40 CFR 60.115b(a) (4).

- 37a. i. If there is any deviation from the requirements of this permit, not addressed by the above reporting requirements, as determined by the records required by this permit or by other means, the Permittee shall submit a report within 30 days after the exceedance. The report shall include the information specified in Condition 32(a).
- ii. Notwithstanding the above, if a deviation will occur from required maintenance, repair or other activity that can be scheduled in advance, the Permittee shall also notify the Illinois EPA prior to undertaking such activity that if it is feasible to do so. Such notification shall be submitted at least 5 days in advance unless the activity is scheduled less than 5 days in advance.
- b. In addition to the report required above, the Permittee shall immediately notify the Illinois EPA if:
- i. The feed dryer operates for more than one hour (60 minutes) when the combustion chamber of the boiler is below 1,400°F. (See Condition 10(b))
- ii. The feed dryer is normally being operated by the plant to produce dry feed and is out of service for a period of 36 hours or more, so as to result in above normal levels of wet feed product. This notification shall explain how wet feed is being managed during the outage of the dryer.
- c. These provisions specifying the timing for notification of deviations may be revised in the operating permit for this source.
38. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing, or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

39. Under this permit, the plant may be operated for a period of one year from initial startup of the feed dryer to allow for equipment shakedown and emission testing as required.

- 40a. This approval to construct does not relieve the Permittee of the responsibility to comply with all local, state, and federal regulations which are part of the applicable Illinois State Implementation Plan, as well as other applicable federal, state, and local requirements.
- b. In the event that the operation of this plant results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to increases in stack heights, changes in process equipment or installed control devices (such as increasing water flow rate in scrubbers or improving the quality of the water), or installation of additional controls, in order to eliminate the odor nuisance.

If you have any questions on this permit, please call Minesh Patel at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MVP:psj

cc: Region 3

ATTACHMENT A

Listing of Identified Emission Units and Process Equipment

Operation	Emission Unit/Process Equipment	Emission Control Equipment
Boiler (Thermal Oxidizer)	Feed Dryer/Evaporator	Thermal Oxidizer Waste Heat Boiler
	Feed Cooler	Thermal Oxidizer Waste Heat Boiler
Corn Receiving/Storage System	Truck and Rail Dump Station	Baghouse (1101)
	Conveyors	Baghouse (1101)
	Elevators	Baghouse (1101)
	Storage Bins	Baghouse (1101)
	Day Bin	Baghouse (1101)
	Hammermill Feed	Baghouse (1101)
Hammermilling Operation	Hammermills	Baghouse (1201)
	Conveyors	Baghouse (1201)
Cooking, Liquification, Fermentation	Mixer*	----
	Slurry Tank*	----
	Cook Water Tank*	----
	Yeast Tank*	----
	Pre-Fermenters	Main Fermentation Scrubber (1401)
	Yeast Tank*	----
	Fermenters (1-6)	Main Fermentation Scrubber (1401)
	Beer Well	Main Fermentation Scrubber (1401)
Distillation	Beer Column	----
	Side Stripper	----
	Rectifier Column	----
	190 Proof Condenser/evaporator	----
	190 Proof Storage Tank (T01)	Floating Roof with Vapor Mounted Rim Seal
	Molecular Sieve	----
	CIP Mash Screen	----
	200 Proof Condenser	Distillation Scrubber (1501)
Solid Separation and Evaporation	Centrifuges*	----
	Centrate Tank*	Distillation Scrubber (1501)
	Evaporators	----
	Syrup Tank*	----
	Thin Stillage Tank*	----
	Whole Stillage Tank*	----
	Cooler	Thermal Oxidizer/Waste Heat Boiler (5001)
Feed Storage/Loadout	Dry Feed Storage*	Baghouse (1102)
	Truck/Rail Car Loadout	Baghouse (1102)
	Wet Feed Storage and Loadout	----

* Enclosed

ATTACHMENT A
(Continued)

Operation	Emission Unit/Process Equipment	Emission Control Equipment
Storage Tanks	Off Spec Tank	Floating Roof with Vapor Mounted Rim Seal
	Anhydrous Alcohol Tank	Floating Roof with Vapor Mounted Rim Seal
	Gasoline Denaturant Tank	Floating Roof with Vapor Mounted Rim Seal
	Denatured Alcohol Tank	Floating Roof with Vapor Mounted Rim Seal
Ethanol Loadout	Truck/Railcar Fuel Unload/Loading Racks	Flare (2210)
Equipment Components (Valves, Flanges, Pumps, Seals, etc.)	Processing of Material Throughout the Source's Piping System	Routine Maintenance Work Practices and Equipment Replacement
Miscellaneous Process	Cooling Tower	----
Fugitive/Uncaptured Emissions	Plant Roads and Parking Areas	----

ATTACHMENT B

Annual Emission Limitations (Tons/Year)

<u>Emission Unit(s)</u>	<u>PM₁₀</u>	<u>NO_x</u>	<u>SO₂</u>	<u>CO</u>	<u>VOM</u>
Auxiliary Boiler	0.34	11.92	0.04	29.80	1.64
Boiler (Feed Dryer)	5.62	37.76	0.54	20.94	6.99
Corn Unloading & Grain Handling	8.78	----	----	----	----
Hammermill	1.88	----	----	----	----
Pre-fermentation (Scrubber)	----	----	----	----	16.61
Main Fermentation (Scrubber)	----	----	----	----	37.18
Distillation (Scrubber)	----	----	----	----	4.59
Heat Recovery Evaporator	----	----	----	----	0.88
Feed Loadout	1.50	----	----	----	----
Wet Cake Handling	0.44	----	----	----	0.36
Storage Tanks	----	----	----	----	1.92
Ethanol Loading	----	0.44	----	0.44	12.79
Cooling Tower	4.16	----	----	----	----
Component Leaks	----	----	----	----	15.14
Plant Roads/Parking Areas	35.37	----	----	----	----
Miscellaneous Units	1.00	----	----	----	1.00
Total	59.09	50.12	0.58	51.19	99.10

<u>Emission Unit(s)</u>	<u>Acet.^a</u>	<u>Other HAPs^a</u>	<u>Total HAPs^a</u>	<u>Ind. HAP^a</u>
Auxiliary Boiler	----	0.66 ^b	0.66	0.16
Boiler (Feed Dryer)	0.52 ^b	1.39 ^b	1.91	0.70
Corn Unloading & Grain Handling	----	----	----	----
Hammermill	----	----	----	----
Pre-fermentation (Scrubber)	3.08 ^b	2.00 ^b	5.08	1.66
Main Fermentation (Scrubber)	4.50 ^b	4.46 ^b	8.96	3.72
Distillation (Scrubber)	1.69 ^b	0.55 ^b	2.24	0.46
Heat Recovery Evaporator	0.01 ^b	0.13	0.14	0.09
Feed Loadout	----	----	----	----
Wet Cake Handling	0.01 ^b	0.04	0.05	0.04
Storage Tanks	0.01 ^b	0.29	0.30	0.19
Ethanol Loading	0.01 ^b	1.92	1.93	1.28
Cooling Tower	----	----	----	----
Component Leaks	0.01 ^b	2.27	2.28	1.51
Plant Roads/Parking Areas	----	----	----	----
Miscellaneous Units	0.10	0.15	0.25	0.10
Total	9.94	13.86	23.83	9.91

Notes:

^a "Acet." is acetaldehyde. "Other HAPs" is the combination of HAPs excluding acetaldehyde. "Total HAPs" is the combination of HAPs including acetaldehyde. "Ind. HAP" is any individual HAP other than acetaldehyde.

^b Specific limits for acetaldehyde and other HAPs emissions are set for these units that are greater and lower than 10 percent of the VOM limitation as otherwise generally required for HAPs by Condition 2(b) (ii).

ATTACHMENT C

Operating Requirements for Storage Tanks

- 1a. The internal floating roof shall float on the liquid surface at all times, except during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of emptying or refilling shall be continuous and shall be accomplished as rapidly as possible.
- b. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface.
- c. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- d. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- e. Rim space vents shall be equipped with a gasket and be sent to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- f. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- g. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- h. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- i. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted.
- j. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has holes, tears, or other openings in the seal or seal fabric, or the gaskets no longer close off.

2. The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for each tank (T1-T5) as follows:
 - a. Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once ever 12 months (Annual Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., the internal floating roof is not resting on the surface of the VOL inside the storage tanks, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric) that the Permittee must repair or otherwise remove the storage tank from service.
 - b. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes (if any), and sleeve seals (if any) each time the storage vessel is emptied and degassed (Out-of Service Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area) that the Permittee shall repair the features prior to refilling the storage tank with VOL. These inspections shall be performed at least every 5 years for tanks equipped with two continuous seals or otherwise at least every 10 years.

ATTACHMENT D

Operating Requirements for Grain Handling Operations

1. Permittee shall implement and use the following housekeeping practices:
 - a. Air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation.
 - b. Cleaning and Maintenance.
 - i. Floors shall be kept swept and cleaned from boot pit to cupola floor. Roof or bin decks and other exposed flat surfaces shall be kept clean of grain and dust that would tent to rot or become airborne.
 - ii. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere.
 - iii. The yard and surrounding open area, including but not limited to ditches and curbs, shall be cleaned to prevent the accumulation of rotting grain.
 - c. Dump pit.
 - i. Aspiration equipment shall be maintained and operated.
 - ii. Dust control devices shall be maintained and operated.
 - d. Head House. The head house shall be maintained in such a fashion that visible quantities of dust or dirt are not allowed to escape to the atmosphere.
 - e. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust.
 - f. Housekeeping Check List. Housekeeping check lists to be developed by the Illinois EPA shall be completed by the manager and maintained on the premises for inspection by the Illinois EPA.
2. The Permittee shall demonstrate compliance with the following:
 - a. Cleaning and Separating Operations.
 - i. Particulate matter generated during cleaning and separating operations shall be captured to the extent necessary to prevent visible particulate matter emissions directly into the atmosphere.
 - ii. For grain-handling sources having a grain throughput of not more than 2 million bushels per year or located outside a major population area, air contaminants collected from cleaning and separating operations shall be conveyed through air pollution control equipment which has a rated and actual particulate removal efficiency of not less than 90 percent by weight prior to release into the atmosphere.

b. Dump-Pit Area.

i. Induced Draft.

- A. Induced draft shall be applied to major dump pits and their associated equipment (including, but not limited to, boots, hoppers and legs) to such an extent that a minimum face velocity is maintained, at the effective grate surface, sufficient to contain particulate emissions generated in unloading operations. The minimum face velocity at the effective grate surface shall be at least 200 fpm, which shall be determined by using the equation:

$$V = Q/A$$

Where:

V = Face velocity; and

Q = Induced draft volume in scfm; and

A = Effective grate area in ft²; and

- B. The induced draft air stream for grain-handling sources having a grain throughput of not more than 2 million bushels per year or located outside a major population area shall be confined and conveyed through air pollution control equipment which has an overall rated and actual particulate collection efficiency of not less than 90 percent by weight; and
- C. Means or devices (including, but not limited to, quick-closing doors, air curtains or wind deflectors) shall be employed to prevent a wind velocity in excess of 50 percent of the induced draft face velocity at the pit; provided, however, that such means or devices do not have to achieve the same degree of prevention when the ambient air wind exceeds 25 mph. The wind velocity shall be measured, with the induced draft system not operating, at a point midway between the dump-pit area walls at the point where the wind exits the dump-pit area, and at a height above the dump-pit area floor of approximately 2 ft.

Note: These requirements apply to major dump pits as defined by 35 IAC 211.3570 and do not apply to unloading of grain with portable equipment.

- c. Internal Transferring Area.
 - i. Internal transferring area shall be enclosed to the extent necessary to prohibit visible particulate matter emissions directly into the atmosphere.
 - ii. Air contaminants collected from internal transfer operations for grain-handling sources having a grain throughput of not more than 2 million bushels per year and are located outside a major population area shall be conveyed through air pollution control equipment which has a rated and actual particulate removal efficiency of not less than 90 percent by weight prior to release into the atmosphere.

ATTACHMENT E

Operating Requirements for Loading Racks

1. At all times during the loading of ethanol into any delivery vessel, the vapor control system shall operate and all vapors displaced during loading are to be vented only to the vapor control system.
2. There shall be no liquid drainage from the loading device of the loading rack when it is not in use.
3. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with the loading rack. The vapor collection system and the denatured ethanol loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection.
4. All loading and vapor return lines shall be equipped with fittings that are vapor tight.

ATTACHMENT F

Operating Requirements for Flare

1. The flare shall be operated by the Permittee with no visible emissions as determined by the methods specified in 40 CFR 60.18(f)(1), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
2. The flare shall be operated by the Permittee with a flame present when vapors displaced by ethanol loadout are being vented to it, as determined by the methods specified in 40 CFR 60.18(f)(2).
3. The flare shall be used only with the net heating value of the gas being combusted being 300 Btu/scf or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR 60.18(f)(3). Note: Natural gas or other gaseous fuel may be added to the displaced vapors to comply with this requirement.
4. The flare shall be operated by the Permittee with an exit velocity less than the maximum allowable velocity, V_{max} , as determined by the method specified in 40 CFR 60.18(f)(6).
5. The Permittee shall monitor the flare to ensure that it is operated and maintained in conformance with the manufacturer's design, as required by 40 CFR 60.18(d).
6. The Permittee shall generally operate the ethanol loadout operation with the flare system in accordance with good air pollution control practice to minimize emissions of volatile organic material (VOM).
7. A pilot flame shall be present in the flare at all times when loading may occur. The presence of pilot flame shall be verified using a thermocouple or equivalent device to detect the presence of a flame. An affected loading rack must be shut down and not allow loading if a flame is not detected in the flare.

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